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VIA ECF

The Honorable Sidney H. Stein
United States District Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Nadine Menendez, (S4) 23-cr-490 (SHS)/electronics

Dear Judge Stein:

I am writing to Your Honor to follow up briefly on the requests Your Honor has received from counsel for Messrs. Hana and Daibes about their Bureau of Prisons report dates. I confirm that we have subpoenaed both individuals as defense witnesses in the ongoing trial of Nadine Menendez. I anticipate both would require substantial preparation before being called to testify at trial. It would be very difficult to complete that preparation if either individual is incarcerated at a BOP facility far from New York City, which I gather is what the BOP contemplates. Accordingly, if the Court would consider exercising its discretion to delay their report dates until after the defense case is completed, it would significantly assist us in preparing Ms. Menendez's affirmative case.

Respectfully submitted,



Barry Coburn